

December 16, 1988

MEMORANDUM

SUBJECT: Sampling Activity at Chemical Commodities, Inc., 20201 West 55th Street, Shawnee, Kansas

FROM: Mark T. Roberts, EP&R/SINV

TO: Charles P. Hensley, Chief, EP&R

*Chem Comm - Shawnee*  
ID #: *K50980632962*  
Break: *1.3*  
Other: *EPA*  
*12-16-88*

I. SITUATION

Chemical Commodities, Inc. (CCI) owns and operates a warehouse at 20201 West 55th, Shawnee, Kansas 66203. The facility is one of several in the Metropolitan Kansas City area that have been or are occupied by CCI. The Shawnee warehouse is used for the storage and repackaging of various chemical products.

The CCI warehouse has been the focus of at least three State regulatory actions (i.e. mandated cleanups) in the past - one in 1981, a second in 1982, and a third in 1986. The property owner, Mr. Gerald Gershon, complied with the orders in each instance. Recently, the EPA has initiated an investigation at the Shawnee facility as a result of an incident on December 7, 1988 involving a semi-trailer containing ammonium perchlorate. The tractor pulling this trailer caught fire on Leavenworth Road in Kansas City, Kansas while enroute to the CCI warehouse in Shawnee. The payload was not under manifest nor was the trailer placarded. A RCRA inspection of the warehouse was conducted by Region VII personnel immediately following the incident. Initial observations made during the RCRA inspection indicated that the potential existed for the offsite release of hazardous substances. Of particular concern was a pole barn structure south of the main warehouse. The pole barn, enclosed on three sides and open to the east, was also used for the storage of a variety of chemical products. Local surface water drainage in the area of the warehouse and pole barn is predominantly easterly and, according to KDHE field investigator Jim Fischer, flows directly through the stored materials in the pole barn during heavy rainfall events.

On December 9, 1988, Mark Roberts, EP&R/SINV, and Joe Chandler, Ecology and Environment, Inc. Technical Assistance Team (E&E/TAT), performed a site reconnaissance to assess the potential for the offsite release of hazardous substances. Surface runoff pathways were evident, particularly in the area of the pole barn where the runoff has formed erosion gullies leading to the adjacent property to the east. The soil/sediment and standing water in these pathways were targeted for sampling in a sampling plan that was drafted on December 12, 1988.

II. SITE ACTIVITIES

On December 15, 1988, at 1500 hours, Mark Roberts and Bruce Morrison, EP&R/SINV, arrived at the CCI Shawnee facility to implement the proposed sampling activities. Access to the property for the purpose of sampling had been verbally granted to Martha Steincamp,



CNSL, by the CCI attorney on December 14, 1988.

A total of five (5) soil/sediment samples, including one duplicate sample, were collected by Roberts and Morrison from the aforementioned surface drainage pathways. Each of the samples consisted of ten (10) aliquots (0-2" interval) collected along one of the various drainageways and then composited and homogenized in a disposable aluminum pan. The samples were collected with laboratory-cleaned stainless steel spoons. After homogenization, each sample was divided between two 8-ounce glass jars, labelled, and placed in a cooler for transport to the Region VII EPA Laboratory. All sample lines and aliquots were marked in the field with yellow survey flags and photographed to document their locations. These sample locations are indicated in Figure 1 (attached).

The samples were stored in a secure refrigeration unit at the EPA lab overnight; the transfer of the samples under chain-of-custody was completed the following morning (December 16, 1988). A summary of the samples collected in the effort is presented in the table below. The single water sample that had been proposed for collection was not retrieved; all surface water that had been observed at the site during the December 9, 1988 site reconnaissance had dissipated by December 15.

SUMMARY OF SOIL/SEDIMENT SAMPLES: CCI, SHAWNEE, KANSAS  
DECEMBER 15, 1988

<u>Sample No.</u>	<u>Time of Collection</u>	<u>Requested Analyses</u>	<u>Description</u>
PKB69001	1530	Pesticides, Metals, Anion Scan	Background - West of Pole Barn
PKB69002	1540	Pesticides, Metals, Anion Scan	Drainageway North of Pole Barn
PKB69003	1520	Pesticides, Metals, Anion Scan	Drainageway East of Pole Barn
PKB69004	1515	Pesticides, Metals, Anion Scan	Drainageway on Adjacent Property to the East
PKB69004D	1515	Pesticides, Metals, Anion Scan	Duplicate of -004

Future actions in the characterization of potential offsite contaminant releases should address the areas potentially affected by drainage from trench-type floor drains at the east end of the main warehouse interior. These drains were reported by John Bosky, ENSV/RCRA, following the completion of the recent RCRA inspection. Neither Bosky nor Jim Fischer, KDHE, could identify the destination of drainage constituents once they exited the building (e.g. septic field, sewer). An attempt to examine these interior drains was made during the December 15 sampling effort. The CCI warehouse was locked, however, and when entrance was requested through an adjoining furniture manufacturing facility (same building), an employee stated that he had been given instructions by his supervisor to deny entry to the CCI warehouse.